

THE HONORABLE RONALD B. LEIGHTON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

HIDDEN HILLS MANAGEMENT, LLC,
and 334TH PLACE 2001, LLC,

Plaintiffs,

v.

AMTAX HOLDINGS 114, LLC, and
AMTAX HOLDINGS 169, LLC

Defendants.

AMTAX HOLDINGS 114, LLC, AMTAX
HOLDINGS 169, LLC, and PARKWAY
APARTMENTS, LP

Counter-Plaintiffs,

v.

HIDDEN HILLS MANAGEMENT, LLC,
and 334TH PLACE 2001, LLC

Counter-Defendants.

No. 3:17-cv-06048-RBL

**DEFENDANTS AND COUNTER-
PLAINTIFFS' NOTICE OF APPEAL AND
REPRESENTATION STATEMENT**

1 Notice is hereby given that Defendants and Counter-Plaintiffs AMTAX Holdings 114,
 2 LLC, acting directly, and AMTAX Holdings 169, LLC, acting both directly and derivatively on
 3 behalf of Parkway Apartments, LP, appeal to the United States Court of Appeals for the Ninth
 4 Circuit from the Amended Judgment (Dkt. # 138) entered on September 10, 2019 in the
 5 underlying matter in the District Court for the Western District of Washington. This case was
 6 first filed in the District Court on December 14, 2017 (Dkt. # 1). Plaintiff and Counter-
 7 Defendant Hidden Hills Management, LLC filed its notice of appeal with the District Court on
 8 October 8, 2019 (Dkt. # 140). The fees for this appeal have been paid.

9 Defendants and Counter-Plaintiffs' Representation Statement is attached to this Notice.

10 The mailing address for Defendants and Counter-Plaintiffs is:

11 Christopher G. Caldwell, admitted *pro hac vice*
 12 Eric S. Pettit, admitted *pro hac vice*
 13 725 S Figueroa Street, 31st Floor
 14 Los Angeles, CA 90017

15 RESPECTFULLY SUBMITTED this 9th day of October, 2019.

16 **Perkins Coie LLP**

17 By: /s/ Steven D. Merriman
 18 David J. Burman, WSBA #10611
 19 Steven D. Merriman, WSBA #44035
 20 1201 Third Avenue, Suite 4900
 21 Seattle, WA 98101-3099
 22 Telephone: 206.359.8000
 23 Facsimile: 206.359.9000
 24 Email: DBurman@perkinscoie.com
 25 SMerriman@perkinscoie.com

26 **Boies Schiller Flexner LLP**

Christopher Caldwell, admitted *pro hac vice*
 Eric Pettit, admitted *pro hac vice*
 725 S Figueroa Street, 31st Floor
 Los Angeles, CA 90017
 Telephone: 213.629.9040
 Facsimile: 213.629.9022
 Email: ccaldwell@bsfllp.com
 epettit@bsfllp.com

Attorneys for Defendants and Counter-Plaintiffs

REPRESENTATION STATEMENT

Pursuant to Ninth Circuit Rule 3-2(b), Defendants and Counter-Plaintiffs AMTAX Holdings 114, LLC, acting directly, and AMTAX Holdings 169, LLC, acting directly and derivatively on behalf of Parkway Apartments, LP, identify the following parties to this action, and their counsel of record:

1. Plaintiffs and Counter-Defendants Hidden Hills Management, LLC and 334th Place 2001, LLC

David R. Goodnight
Rita V. Latsinova
J. Scott Pritchard
Stoel Rives LLP
600 University Street, Suite 3600
Seattle, WA 98101
Phone Number: 206.624.0900

2. Defendants and Counter-Plaintiffs AMTAX Holdings 114, LLC and AMTAX Holdings 169, LLC

David J. Burman
Steven D. Merriman
Mallory Gitt Webster
Perkins Coie
1201 3rd Ave., Ste. 4900
Seattle, WA 98101-3099
Phone Number: 206.359.8000

Christopher G. Caldwell
Eric S. Pettit
Arwen R. Johnson
Craig H. Bessenger
Boies Schiller Flexner LLP
725 S. Figueroa Street, 31st Floor
Los Angeles, CA 90017
Phone Number: 213.629.9040

DATED this 9th day of October, 2019.

Perkins Coie LLP

By: /s/ Steven D. Merriman
David J. Burman, WSBA #10611
Steven D. Merriman, WSBA #44035
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: 206.359.8000
Facsimile: 206.359.9000
Email: DBurman@perkinscoie.com
SMerriman@perkinscoie.com

Boies Schiller Flexner LLP

Christopher G. Caldwell, admitted *pro hac vice*
Eric S. Pettit, admitted *pro hac vice*
725 S Figueroa Street, 31st Floor
Los Angeles, CA 90017
Telephone: 213.629.9040
Facsimile: 213.629.9022
Email: ccaldwell@bsfllp.com
epettit@bsfllp.com

Attorneys for Defendants and Counter-Plaintiffs

CERTIFICATE OF SERVICE

On October 9, 2019, I caused a copy of Defendants and Counter-Plaintiffs' Notice of Appeal and Representation Statement to be electronically filed via the Court's Electronic Case Filing System, which will notify all attorneys of record of the filing.

By: /s/ Steven D. Merriman
Steven D. Merriman